

VERIFIED STATEMENT
OF
NANCY B. WEBER

TELECOMMUNICATIONS DIVISION
ILLINOIS COMMERCE COMMISSION

VERIFIED PETITION FOR ARBITRATION OF INTERCONNECTION RATES,
TERMS AND CONDITIONS AND RELATED ARRANGEMENTS PURSUANT TO
SECTION 252(B) OF THE TELECOMMUNICATIONS ACT OF 1996.

ISSUES:

BILLING 1, 2

DOCKET NO. 03-0239

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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Nancy B. Weber, and my business address is 160 North LaSalle,
4 Suite C-800, Chicago Illinois, 60601.

5
6 **Q. By whom are you employed and in what capacity?**

7 A. I am currently employed by the Illinois Commerce Commission ("Commission") in
8 the Telecommunications Division as the Project Manager for the independent
9 third party review of SBC Illinois' Operation Support Systems ("OSS") pursuant to
10 Condition 29 of the SBC/Ameritech Merger Order, Docket 98-0555. As part of
11 the third party review, BearingPoint, Inc. (formerly known as KPMG Consulting,
12 Inc.), is evaluating SBC Illinois' CLEC facing operations and business processes
13 as well as a thorough review of all of SBC Illinois' 150 performance
14 measurements.

15
16 **Q. Please state your education background and previous job responsibilities.**

17 A. I earned my Bachelors of Science degree in Computer Science and Engineering
18 from Bucknell University in 1992. I also received a minor in Mathematics.

19
20 Prior to working for the Commission I was employed by Andersen Consulting,
21 now known as Accenture, as a Manager in its Telecommunications Division.

22 During my time with Andersen Consulting, I gained extensive experience in all
23 phases of software development. I developed both functional business

requirements and technical specifications, planned application architectures, designed relational databases, developed mainframe and client server applications, wrote technical reference guides, conducted user training sections, directed project teams, wrote business proposals and fostered client relationships. I worked in both the telecommunications and healthcare industries. For more than three years of my time with Andersen Consulting, I worked on various engagements involving SBC Illinois.

II. PURPOSE OF THE TESTIMONY

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to provide Staff's viewpoint on two issues at arbitration related to the Billing Article of the proposed Interconnection Agreement (ICA) between AT&T Communications of Illinois, Inc., TCG Illinois and TCG Chicago (collectively "AT&T"); and SBC Illinois ("SBC" or "Ameritech"). The issues I discuss in my testimony are Comprehensive Billing 1 and 2 as set forth in Attachment B to the arbitration petition.

III. BILLING ISSUES

Billing 1: Should CABS billing be used when the OBF has established guidelines for its use?

Q. Please explain the function of the Ordering and Billing Forum ("OBF").

A. The OBF is part of the Alliance for Telecommunications Industry Solutions ("ATIS"). OBF provides an opportunity for representatives from the telecommunications industry to identify, discuss and resolve national issues

affecting ordering, billing, provisioning and exchange of information about access service, and other connectivity related matters.

Q. Are OBF guidelines binding on all parties?

A. No, it is my understanding that OBF develops non-binding operational guidelines and resolutions and it is within the entity's sole discretion whether or not it will implement a resolution. However, broad and consistent implementation of a consensus resolution is a fundamental expectation and reason for the existence of the OBF. If none of the entities involved in the OBF ever implemented the guidelines developed and agreed upon via consensus, then there would be no purpose for the OBF to exist.

Q. Are you aware of any billing changes SBC has made to comply with OBF guidelines?

A. Yes. In the fall of 2001, SBC converted the billing of UNE-P port charges to the Carrier Access Billing System ("CABS") from the Resale Billing System ("RBS") in order to provide billing information according to OBF guidelines. The guidelines specifically stated that UNE-P Port and Loop billing should be combined and specifications were established for the CABS billing format¹.

¹ Staff Ex 4.0, Schedule 4.04. SBC Accessible Letter CLECAM01-148 dated June 29, 2001.

66 **Q. What duration of time did it take SBC to perform the UNE-P conversion**
67 **from RBS to CABS?**

68 A. It is my understanding that the UNE-P conversion to CABS took SBC several
69 months to perform and then SBC required many more months after the initial
70 conversion was complete to perform clean up and reconciliation activities.²
71

72 **Q. What specific language is AT&T requesting be included in the**
73 **interconnection agreement?**

74 A. AT&T is proposing that the following language be included in Comprehensive
75 Billing Section 27.1.3;

76 SBC Illinois will bill in accordance with this Article those charges
77 AT&T incurs under this Agreement; including charges for Resale
78 services, Network Elements, Interconnection and other services,
79 except as noted in Section 27.1.1 of this Article. AT&T will bill in
80 accordance with this Article those charges SBC-Illinois incurs under
81 this Agreement; including charges for Interconnection and other
82 services. **Each bill will be formatted in CABS for all charges and**
83 **services where the OBF has developed guidelines.** The
84 requirements for CABS billing under this Article are set forth in section
85 27.3 of this Article. The requirements for resale billing and other
86 charges billed by agreement of the Parties from SBC-Illinois's resell
87 billing system are set forth at section 27.4 of this Article
88

89 **Q. What would be the effect of this language if included in the interconnection**
90 **agreement?**

91 A. The affect of including the language proposed by AT&T in the interconnection
92 agreement would basically require that SBC bill all charges and services, which
93 the OBF has developed guidelines for CABS based billing, out of its CABS billing

² Staff Ex. 4.0, Schedule 4.01. SBC Accessible Letter CLECAM02-017.

94 system. This requirement appears to be a blanket requirement and does not
95 provide for an evaluation: (1) of the specific charges and services not currently
96 billed by CABS for which specifications exist; (2) by SBC of the cost and effort to
97 develop the functionality within CABS; or (3) to perform the conversion from RBS
98 to CABS for these products and services.

99
100 **Q. Does AT&T indicate which products or services it is interested in having**
101 **SBC move to CABS?**

102 A. AT&T witness Moore states that OS/DA services should be billed by CABS and
103 not by SBC's RBS since the OBF has developed guidelines for the use of CABS
104 to bill for OS/DA services.³ In response to Staff Data Request NW 1.04, SBC
105 stated that OS and DA usage are the only UNE products currently billed in a
106 separate system outside of CABS.⁴

107
108 **Q. What argument does AT&T provide for requiring that this language be**
109 **included?**

110 A. AT&T's argument in support of its proposed interconnection language is that the
111 use of multiple billing systems by SBC increases the difficulty of the bill validation
112 processes for AT&T's resources and that uniformity in the industry is beneficial to
113 all CLECs and promotes consistent application of the industry guidelines. AT&T
114 also is looking for a single national standard to follow with all ILECs for billing and
115 since the only national standard available is that set forth by OBF, AT&T believes

SBC should not have unilateral authority under the ICA to choose when it will or will not follow the national standards.⁵

Q. Has AT&T provided any other support for its position?

A. Yes. In response to Staff Data Request NW 1.02, AT&T states that validation of its OS and DA bills from SBC's RBS billing system today can only be validated on a manual basis.⁶ Further, AT&T believes if OS and DA bills were formatted in CABs and delivered electronically then the validation of accuracy and expense content could be performed electronically.⁷

Q. Would AT&T be the only company impacted by a move of certain charges and services to CABS?

A. No, it is my understanding that all CLECs receiving bills for those charges and services would be impacted as SBC has stated that its billing systems are regional in nature⁸.

Q. What is your opinion of AT&T's position?

A. I don't disagree with AT&T's statement that a unified billing system would be more consistent and beneficial to CLECs, as this statement is valid. AT&T, however, has not provided any quantitative analysis of the impact to its business

³ AT&T Exhibit 3.0 at 10 ¶¶20. Staff Ex. 4.0, Schedule 4.02. AT&T Response to Staff Data Request NW 1.04.

⁴ Staff Ex. 4.0, Schedule 4.02. SBC Response to Staff Data Request NW 1.04.

⁵ AT&T Exhibit 3.0 at 12-13 ¶¶26-27.

⁶ Staff Ex. 4.0, Schedule 4.02. AT&T Response to Staff Data Request NW 1.02.

⁷ Id.

136 if the billing for charges and services for which OBF guidelines have been
137 developed are not moved to CABS. AT&T currently receives its bills from SBC
138 for its OS/DA charges and services in the RBS format and has received them in
139 this format since its entry into the market, which for residential service was June
140 2002 and for business service was July 2001.⁹ Without more tangible evidence
141 as to the impact to AT&T if SBC does not move its billing of OS/DA service to
142 CABS, it is difficult for Staff to recommend that SBC must incur the cost and time
143 at this immediate date to perform the switch. As CLECS and Staff observed in
144 SBC's last conversion of UNE-P products to CABS, the process and effort
145 associated with modifying SBC's billing systems is not a quick nor a seamless
146 endeavor. Therefore, AT&T's proposed language should not be adopted.

147
148 **Q. Does this mean you believe SBC does not need to implement the**
149 **guidelines developed by OBF?**

150 **A.** No. I believe that there is a definite reason the guidelines have been developed
151 and that SBC should be looking to comply with those industry standards over
152 time. However, I believe the decision of whether or not the guidelines will be
153 implemented or followed needs to be fully analyzed by SBC. In response to Staff
154 Data Request NW 1.01, SBC indicated that it has not evaluated the effort or
155 process SBC would need to undertake to move its billing of OS and DA services
156 from RBS to CABS in the Midwest region¹⁰. The company also needs to discuss
157 whether or not it will make the switch with all CLECs who receive the bills to

⁸ SBC Illinois Ex. 13.0 at 138-142.

⁹ Staff Ex 4.0, Schedule 4.02. AT&T Response to Staff Data Request NW 1.01.

determine if it is a move supported by the majority of CLECs¹¹. Then, if a decision is made to implement the industry standards, the actual transition to the defined standards needs to be thoroughly planned, scheduled and handled through the formal process defined for major system changes.

Q. What reason does SBC Illinois provide for why it will not bill its OS/DA charges out of CABS?

A. SBC witness Roman Smith explains that it costs money to switch from one billing system to another and that there is a potential for substantial disruption to the flow of accurate bills during a conversion¹². He proceeds to say that, absent complaints that SBC Illinois' bills are inaccurate or untimely, it is not appropriate for the Commission to intervene in the method by which SBC Illinois renders its bills.¹³

Q. Does SBC provide an explanation why it bills OS/DA charges out of CABS in its Southwest region and not in Illinois or the SBC Midwest region?

A. SBC witness Smith explains that each of its four separate Regional Bell Operating Companies had, and still have, its own billing systems and SBC has not yet chosen to perform the conversions necessary to have the same billing

¹⁰ Staff Ex. 4.0, Schedule 4.03. SBC Response to Staff Data Request NW 1.01.

¹¹ Staff Ex. 4.0, Schedule 4.02. In response to Staff Data Request NW 1.06, AT&T confirmed that it has not requested that OS and DA services be billed out of CABS in the CLEC user forum.

¹² SBC Illinois Ex. 13.0 at 65-71.

¹³ Id. at 97-99, 122-133.

177 system in all four regions.¹⁴ In response to Staff's data requests SBC indicates
178 that there is no current plan to merge the SBC Midwest CABS system with any
179 other SBC CABS billing system.¹⁵

180
181 **Q. What language is SBC requesting be included in the interconnection**
182 **agreement for Comprehensive Billing Section 27.1.3?**

183 A. SBC has proposed the following language for section 27.1.3;

184 SBC Illinois will bill in accordance with this Article those charges AT&T
185 incurs under this Agreement; including charges for Resale services,
186 Network Elements, Interconnection and other services. **Those billing**
187 **items that are billed today in CABS will remain billed in CABS**
188 **unless the FCC or State Commission rules that the billing item is**
189 **no longer a UNE. At that point, SBC Illinois would make a**
190 **determination on whether the item would remain in CABS billing**
191 **system. Any new elements billed in CABS will be in accordance**
192 **to OBF guidelines where they have been developed.**
193

194 **Q. What is your opinion of the language being proposed by SBC?**

195 A. I believe that out of the three sentences being proposed by SBC that only the
196 third sentence, "Any new elements billed in CABS will be in accordance to OBF
197 guidelines where they have been developed", is appropriate. If a new element is
198 to be billed out of CABS then SBC should definitely follow the OBF guidelines
199 that have been developed. The first two sentences proposed by SBC, on the
200 other hand, "Those billing items that are billed today in CABS will remain billed in
201 CABS unless the FCC or State Commission rules that the billing item is no longer
202 a UNE. At that point, SBC Illinois would make a determination on whether the
203 item would remain in CABS billing system." should not be adopted. The first two

¹⁴ Id. at 136-145.

204 sentences appear to anticipate changes to the national standards, laws or
205 regulations. The specific impact of changes to laws or rules by the FCC or State
206 Commission should be evaluated once those rules take effect. SBC should not
207 be hedging its position specifically for billing in anticipation of a change in position
208 or law that has not occurred. Other portions of the ICA already account for
209 change in law provisions and it would be redundant to repeat them here.

210
211 The second of the two sentences proposed by SBC states that SBC could make
212 a unilateral decision to remove an element billed in CABS if the FCC or the
213 Commission determines the element is no longer a UNE. By including this
214 language, one might conclude that the FCC or the Commission requires that all
215 UNEs must be billed in CABS. If this in fact were true, since the ICC has ruled
216 SBC Illinois must provide OS/DA as a UNE¹⁵ then SBC would in fact be required
217 to bill OS/DA services out of CABS and this issue would rule in the favor of
218 AT&T. Additionally, if SBC were able to unilaterally remove an element currently
219 billed in CABS and move it to another billing platform for which CLECs were
220 already receiving and processing bills, not only would SBC incur development
221 and implementation costs but CLECs would also incur costs; since many CLECs
222 have already developed automated processes to verify and process the
223 electronic bills they receive from SBC.

¹⁵ Staff Ex. 4.0, Schedule 4.03. SBC response to Staff Data Request NW 1.02-1.03.

¹⁶ IL Docket 98-0396 Order at 95.

To the best of my knowledge, since neither the Commission or the FCC have stated that all UNEs must be billed out of CABS and since changes to the specific elements billed by a given billing system are potentially cost prohibitive (as SBC has reasoned) and time consuming for all parties involved, neither AT&T's language nor the first two sentence of SBC's language should be adopted with out specifics of the billing elements in question or agreement of all parties affected.

Q. What is your recommendation with respect to this issue?

A. I believe that language proposed by AT&T should be rejected and only the last sentence of the language proposed by SBC should be accepted as follows for Section 27.1.3.

SBC Illinois will bill in accordance with this Article those charges AT&T incurs under this Agreement; including charges for Resale services, Network Elements, Interconnection and other services. ***Any new elements billed in CABS will be in accordance to OBF guidelines where they have been developed.***

Additionally, I believe SBC should conduct an analysis of the cost and process involved if it were to move its OS and DA charges to CABS since national guidelines for CABS billing have been in place for some time for OS and DA charges. Likewise, AT&T should raise this issue in the forum for which these changes are usually requested and discussed and bring other CLECs into the dialogue.

Billing 2: Should the billed party have the discretion to designate a changed billing address for different categories of bills upon 30 days written notice to the billing party?

Q. What is AT&T specifically requesting be performed?

A. AT&T believes that the billing party, in this case SBC, should provide for a specific category of a bill to be sent to a different address as a result, for example, of a reorganization of functions at the billed party. AT&T also argues that since SBC Illinois currently sends AT&T's collocation bills to a separate address from all other AT&T bills, that SBC should have the ability to do so for other categories of bills.¹⁷

A. What reason does AT&T provide for its position?

Q. AT&T witness Moore believes the billing payment process would be expedited if it were to receive bills from SBC that were broken down by specific categories and mailed to separate AT&T billing addresses.¹⁸ AT&T refers to the tight timeframes for payment that exist under the ICA and the fact that AT&T's timely payment is jeopardized by the need to internally redistribute bills once received.

A. Does AT&T indicate which billing categories it would like to receive separate bills for?

Q. The only two billing categories discussed by AT&T are collocation and directory billing. It is unclear whether or not there are other categories of bills AT&T would like to receive separate bills for.

¹⁷ AT&T Exhibit 3.0 at 13 ¶28.

¹⁸ Id. at 14 ¶33.

273

274 **Q. What is SBC's position on this issue?**

275 A. SBC argues that its billing systems do not have the capability to provide multiple
276 locations for billing delivery per company other than the ability to provide
277 separate bills on a per billing account number ("BAN") level, but only for paper
278 bills. SBC states that only one billing address can be assigned per Access
279 Customer Name Abbreviation ("ACNA") for electronic billing purposes. BANS
280 correlate to classes of service and more than one BAN is assigned to AT&T's
281 ACNA in Illinois.¹⁹

282

283 **Q. What is your recommendation with respect to this issue?**

284 A. AT&T's proposed language for Section 27.2.1.3 should be rejected. AT&T does
285 not provide specifics for its proposal nor does it sufficiently quantify the impact to
286 AT&T of SBC not complying with its request. If, in fact, AT&T is impeded from
287 paying its bills on time due to receipt of all electronic bills to a single address then
288 perhaps AT&T should negotiate a timeframe greater than the current 30 days
289 from Bill Date to submit payment to SBC (as detailed in article 27.3 of the
290 proposed interconnection agreement).

291

292 **Q. Does this conclude your testimony?**

293 A. Yes, it does.

¹⁹ SBC Illinois Ex. 13.0 at 183-195.

State of Illinois)

City of Chicago)

AFFIDAVIT OF NANCY B. WEBER

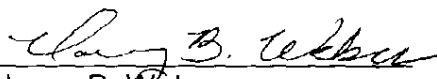
Nancy B. Weber, under oath, deposes and states as follows:

1. My name is Nancy B. Weber. My business address is 160 North LaSalle, Chicago, Illinois 60601. I am a Project Manager in the Telecommunications Division of the Illinois Commerce Commission.


2. The attached affidavit prepared for use in Docket 03-0239 is based on my personal knowledge.

3. I hereby swear and affirm that the information contained in the document cited above are true and correct to the best of my knowledge and belief.

Further affiant sayeth not.


Nancy B. Weber

Subscribed and sworn to before me this 4th day of June 2003.


Notary Public

